

- Application No. 09/761,765
- Reply to Office Action of March 22, 2004

REMARKS/ARGUMENTS

Claims 26-34 and 36-49 are active in this application. Claim 26 has been amended to define the at least one additional high index layer having a refractive index of at most 2.3 and comprising at least one of fluorine-doped tin oxide, antimony-doped tin oxide, and aluminium-doped zinc oxide as previously set forth in Claim 35, which has been cancelled. The claimed transparent substrate is not described or suggested by the cited art for the following reasons.

Yoshihiro describes multilayered antireflection film on a transparent substrate.

Yoshihiro also describes a first high refractive index film (12), a first low refractive index film (13), a second high refractive index film consisting of a film having a refractive index between 1.9 – 2.2 (14a) and a second film having a refractive index between 2.2 – 2.5 (14b), and a second low refractive index film (15) exist on top of the transparent substrate. The Examiner has asserted that Yoshihiro describes an antimony-doped tin oxide layer. However, this characterization of Yoshihiro is incorrect because Yoshihiro only describes antimony trioxides (see page 6 and the Abstract). Yoshihiro does not describe a high index layer having a refractive index of at most 2.3 and comprising at least one of fluorine-doped tin oxide, antimony-doped tin oxide, and aluminium-doped zinc oxide. Therefore, the rejection of Claims 26-31, 34-35, 38-39, 44 and 47-49 under 35 U.S.C. § 102(b) over Yoshihiro should be withdrawn.

The rejections of Claims 33 and 45-49 under 35 U.S.C. § 103(a) in view of Yoshihiro; Claim 32 in view of Yoshihiro with Austin or Machol; Claims 40-45 in view of Yoshihiro with Iida; Claim 32 in view of Yoshihiro with Takase and Austin or Machol; Claims 40-45 in view of Yoshihiro with Takase and Iida; and Claims 40-45 in view of Yoshihiro with Austin or Machol and Iida; Claims 26-31, 33-35, 38-39, and 44-49 in view of Yoshihiro with Takase; and Claims 26-35, 38-39, and 44-49 in view of Yoshihiro with Austin or Machol

should also be withdrawn for the above reasons. In particular, having already established that Yoshihiro does not describe a high index layer as in the present claims, the various secondary references do not supplement for this deficiency and as a result the combination of cited art provides no description or suggestion for the claimed transparent substrate. Further details of the secondary cited art are provided below.

Machol describes multilayered antireflection films wherein metal oxide dielectric films can generally be doped by conductive materials (see col. 6, lines 36-46) to render the film conductive. Additionally, among the materials disclosed as a high refractive index layer is zinc oxide (see col. 4, lines 49-51).

Austin also describes multilayer antireflection layer comprising at least eight layers wherein adjoining layers alternate between high and low refractive index materials (see Abstract). Among the high index material disclosed is zinc oxide (see col. 8, lines 52-57).

Iida describes the production of an infrared *reflector* utilizing a multilayer stack (see Abstract). Thus, Iida describes an article that is clearly different from the claimed transparent substrate which comprises an *anti-reflection* coating.

Takase describes a transparent panel heater for various applications requiring transparency and heating (see Abstract). Takase describes silicon nitride and aluminum nitride as refractive index materials. Furthermore, although various layers are present, Takase does not describe a multilayer stack having alternating thin layers of high and low refractive indices.

Therefore, withdrawal of all of the rejections under 35 U.S.C. § 103(a) over Yoshihiro alone or with others is requested.

The rejection of Claims 26-31, 34, 38-39, 44-45 and 48-49 under 35 U.S.C. § 102(b) is traversed. Claim 35, which was not rejected here, has been incorporated into Claim 26. Therefore, withdrawal of this ground of rejection is requested.

Furthermore, the rejections under 35 U.S.C. § 103(a) of Claims 40-49 in view of Tatsuo; Claim 32 in view of Tatsuo with Austin or Machol; and Claims 33 and 40-45 in view of Tatsuo with Iida should also be withdrawn. In particular, Applicants point out that Tatsuo describes a multilayered *reflector* (3) which acts to reflect (not transmit) infrared radiation. Tatsuo mentions a film (4) for preventing the reflection of visible light, but the film does not appear to be a multilayer stack (see Abstract). The reflector of Tatsuo is clearly different from the claimed substrate with an anti-reflection coating. Furthermore, as noted above, each of the secondary art cited fails to describe a high index layer having a refractive index of at most 2.3 and comprising at least one of fluorine-doped tin oxide, antimony-doped tin oxide, and aluminium-doped zinc oxide.

Therefore, withdrawal of all of the rejections under 35 U.S.C. § 103(a) over Tatsuo alone or with others is requested.

The rejection of Claims 26-35 and 38-49 under 35 U.S.C. § 112, second paragraph is addressed by amendment.

Applicants request allowance of this application. Early notice of such allowance is also requested.

Respectfully submitted,

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